Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact Upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	

To: The Commission

COMMENTS OF CANNELL CLEVELAND, L.P.

Cannell Cleveland, L.P. ("Cannell"), licensee of Television Station WUAB(TV), Lorain, Ohio, by its attorneys, submits herewith its Comments on the *ex parte* submission by the Association of Local Television Stations, Inc. ("ALTV") in the above-captioned proceeding.[1/]

I. Introduction.

Although in general agreement with the overall ALTV proposal, Cannell is very concerned about one aspect of ALTV's proposal. It would allow certain stations operating

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1/ Ex Parte Letter from James B. Hedlund of the Association of Local Television Stations, Inc. to the Honorable William Kennard, Nov. 25, 1997 ("*Ex Parte Submission*"). In its December 2, 1997 *Public Notice*, FCC Seeks Comment on Filings Addressing Digital TV Allotments, the Commission requested broadcasters' comments on the *Ex Parte Submission* and an *ex parte* proposal submitted by the Association for Maximum Service Television, Inc.

on UHF channels to increase power above the levels set forth in the DTV allocation table as long as those stations followed pre-set rules. Because of a unique signal propagation that occurs over certain bodies of water, including Lake Erie, Cannell believes that to allow those stations affected to increase power now would be premature and would only compound interference problems.

II. ALTV's Proposal Should Be Deferred Until Broadcasters Have More Experience with DTV Operations.

A number of interference problems will occur when DTV signals sign on over the next several years, including: co-channel and adjacent-channel operations, NTSC channel interference, both of which may be escalated with certain unique propagation situations. Although the effects of co-channel and adjacent-channel interference between NTSC and DTV can now be modeled, the models are not sophisticated enough to replicate the propagation of a signal. Because of that, we have no way to predict the interference, let alone physically test the actual interference, that will occur.

As an example, WUAB(TV), which operates on NTSC Channel 43, anticipates that its NTSC operations will receive substantial interference from a co-channel (43) digital allocation in Detroit, Michigan, and an adjacent-channel (42) digital allocation in Sandusky, Ohio. The Detroit allocation, even assuming no increase in power, will cause serious

interference to WUAB(TV)'s NTSC signal because of the propagation effects of the Detroit station's signal across Lake Erie.[2/] Even without an increase in power, the Detroit station will cause interference to 215,000 households and 586,000 individuals, and the station in Sandusky will interfere with 69,000 households and 183,000 individuals in WUAB(TV)'s Grade B contour.[3/] If either of these stations were permitted to increase power, the interference to WUAB(TV)'s NTSC coverage would be even worse. Accordingly, in its filings in this proceeding, and to ensure against interference with WUAB(TV)'s NTSC signal, Cannell has urged the Commission not to permit the Detroit and Sandusky stations to increase DTV power.[4/] These types of problems will affect the DTV and NTSC operations of a number of stations, not just WUAB(TV), and accordingly real world experience with DTV must be evaluated to determine wisely if a station should be permitted to increase power beyond the levels authorized in the DTV Table.

[2/] *See* Petition for Reconsideration and Clarification of Cannell Cleveland, L.P., MM Docket No. 87-268, at 9 (June 13, 1997); Supplement to Petition for Reconsideration and Clarification of Cannell Cleveland, L.P., MM Docket No. 87-268, at 1-2 (Aug. 22, 1997) ("Cannell Reconsideration Supplement"); Reply of Cannell Cleveland, L.P. to Opposition of Detroit Educational Television Foundation, MM Docket No. 87-268 (Oct. 3, 1997) ("Cannell Reply") (explaining the unique propagation effect of television signals across Lake Erie).

[3/] Cannell Reconsideration Supplement at 2.

[4/] *Id.*; Cannell Reply at 1-4.

III. Conclusion.

Signal propagation is an unusual situation that occurs in various markets across the country. While Cannell understands the effect on its current NTSC operations, the DTV models used to allocate DTV channels are not sophisticated enough to predict this propagation. We believe that ALTV's proposal should be amended to prohibit stations from increasing their allocated power if: (1) there is already proven interference of a DTV allocation with an existing NTSC signal, and (2) where a unique propagation occurs that could increase that interference. In these instances, affected broadcasters must have practical experience with day-to-day DTV operations before any adjustment to power is allowed.

Respectfully submitted,

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